

AO91 (Rev. 12/03) Criminal Complaint

## UNITED STATES DISTRICT COURT

Southern

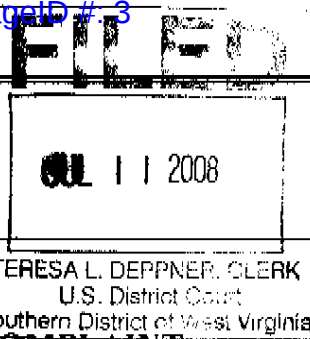
DISTRICT OF

West Virginia

UNITED STATES OF AMERICA  
V.

RONALD WAYNE PRICE

(Name and Address of Defendant)



CRIMINAL COMPLAINT

Case 5:08-mj-00072

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. From 8/03 up to and including 6/08 in and near Wyoming County, in

(Date)

the Southern District of West Virginia defendant(s) did,

(Track Statutory Language of Offense)

having knowledge of the occurrence of an event affecting his continued right to Social Security Disability Insurance Benefits, that is, his employment with, work in and income from a business, did conceal and fail to disclose such event with an intent to secure payment of such benefits fraudulently and in an amount greater than what was due him.

in violation of Title 42 United States Code, Section 408(a)(4)

I further state that I am a Special Agent with SSA OIG and that this complaint is based on the

Official Title

following facts:

See Affidavit

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Timothy A. Morton

Printed Name of Complainant

Sworn to before me and signed in my presence,

Date

July 11, 2008

at

Charleston, West Virginia

City and State

Mary E. Stanley, United States Magistrate Judge

Name and Title of Judge

Signature of Judge

A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to wit:

I, Timothy Morton, being duly sworn, do hereby depose and say:

1. I am a Special Agent ("SA") with the Social Security Administration, Office of the Inspector General. I have been employed with SSA since July 1990, and have held the position of Special Agent with the Office of Inspector General of the Social Security Administration since October 1997. In my capacity as a Special Agent, I am authorized to apply for and execute warrants and to make arrests.

2. I have reviewed the Social Security Disability file for the case of Ronald Wayne Price of Oceana, West Virginia, and have determined the following:

A. In approximately March 29, 1994, defendant Ronald Wayne Price was granted Disability Insurance Benefits by the Social Security Administration based on his claim that he was disabled to such a degree as to prevent him from maintaining gainful employment.

B. That Ronald Wayne Price's initial application, which bears the signature of "Ronald Wayne Price," dated "1-30-92"

contains Price's agreement to "notify the Social Security Administration if . . . I go to work whether as an employee or self-employed person."

C. From the initial grant of Disability Insurance Benefits in March 28, 1994, up to and including June of 2008, defendant Ronald Wayne Price received monthly Disability Insurance Benefit checks from the Social Security Administration in amounts ranging from approximately \$828 to \$1249 per month.

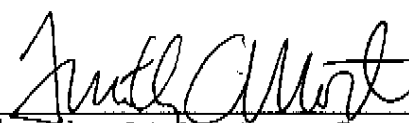
D. On or about April 30, 2001, Ronald Wayne Price filed with the Social Security Administration a "Disability Update Report" whereon he stated and affirmed that he had not worked since June of 1998.

3. During the time defendant Ronald Wayne Price was receiving the Social Security Disability Insurance Benefits described above, he was under a duty to report to the Social Security Administration any work he performed and any income he received from any such work as the same would have been relevant on the issue of his continued eligibility for Disability Insurance Benefits and may have affected the amount of monthly Disability Insurance Benefit payments for which he was eligible.

4. I have interviewed witnesses and have spoken with IRS Special Agents who have interviewed other witnesses in and around

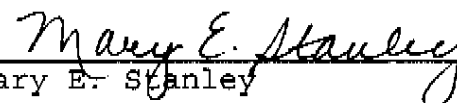
Logan County and Wyoming County, West Virginia and have determined that from a date no later than January 1996, and at all relevant times thereafter, defendant Ronald Wayne Price was employed by, performed work for, and regularly received monetary compensation and income from a business operating in and around Logan County, West Virginia.

5. From a date no later than January 1996 up to an including June of 2008, at or near Wyoming County and Logan County, West Virginia, and elsewhere in the Southern District of West Virginia, defendant Ronald Wayne Price, having knowledge of an event affecting his continued right to Social Security Disability Insurance Benefits, that is, his employment with, work in and income from a business, did knowingly conceal and fail to disclose such event with an intent to secure payment of such benefits fraudulently and in an amount greater than what was due him.



Timothy A. Morton, Special Agent  
Social Security Administration  
Office of the Inspector General

Subscribed and sworn to before me on this 11<sup>th</sup> day of July, 2008.



Mary E. Stanley  
UNITED STATES MAGISTRATE JUDGE